

NICHOLAS A. TRUTANICH
United States Attorney
District of Nevada

ALLISON J. CHEUNG, CSBN 244651
Special Assistant United States Attorney
160 Spear Street, Suite 800
San Francisco, California 94105
Telephone: (415) 977-8942
Facsimile: (415) 744-0134
E-Mail: allison.cheung@ssa.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SHAUN DILLON,

Plaintiff,

v.

ANDREW SAUL,
Commissioner of Social Security,

Defendant.

Case No.: 3:20-cv-00294-CLB

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant Andrew Saul, Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and Remand (Dkt. No. 17, filed on October 14, 2020), currently due on November 13, 2020, by 30 days, through and including December 14, 2020. Defendant further requests that all subsequent deadlines set forth in the Court's scheduling order (Dkt. No. 16) be extended accordingly.

This is Defendant's first request for an extension of time. Good cause exists for this extension due to Defendant's counsel's workload as described below. Since Plaintiff's motion was filed on October 14, 2020, Defendant's counsel has worked on over 20 district court cases and a Ninth Circuit appeal. Counsel is also responsible for other substantive non-litigation matters in the Office of

1 General Counsel. The Office of General Counsel also currently has a number of attorneys out on
2 leave of absence, in addition to staff attrition, which has increased the undersigned's workload.

3 Additional time is required to review the record, to evaluate the numerous issues raised in
4 Plaintiff's motion, to determine whether options exist for settlement, and if not, to prepare Defendant's
5 response to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as
6 possible. This request is made in good faith and with no intention to unduly delay the proceedings,
7 and counsel apologizes for any inconvenience.

8 On November 3, 2020, counsel for Defendant conferred with Plaintiff's counsel, who has no
9 opposition to this motion.

10 It is therefore respectfully requested that Defendant be granted an extension of time to respond
11 to Plaintiff's Motion for Reversal and Remand, through and including December 14, 2020.

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13 Dated: November 4, 2020

Respectfully submitted,

14 NICHOLAS A. TRUTANICH
15 United States Attorney

16 /s/ Allison J. Cheung
17 ALLISON J. CHEUNG
18 Special Assistant United States Attorney

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20 IT IS SO ORDERED:

21 
22 UNITED STATES MAGISTRATE JUDGE

23 DATED: November 4, 2020
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CERTIFICATE OF SERVICE

I, Allison J. Cheung, certify that the following individual(s) were served with a copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** (*FIRST REQUEST*) on the date, and via the method of service, identified below:

CM/ECF:

Cyrus Safa
cyrus.safa@rohlflinglaw.com
Attorney for Plaintiff

Leonard Stone
lstone@shookandstone.com
Attorney for Plaintiff

Dated: November 4, 2020

/s/ Allison J. Cheung
ALLISON J. CHEUNG
Special Assistant United States Attorney